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Gloucester County Education Association

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDREW POLICASTRO, PRO SE,

Plaintiff

vs.

NEW JERSEY EDUCATION ASSOCIATION,
and their officers individually and in their
official capacity; SOMERSET COUNTY
EDUCATION ASSOCIATION, and their
officers individually and in their official
capacity; HUNTERDON COUNTY
EDUCATION ASSOCIATION, and their
officers individually and in their official
capacity; and GLOUCESTER COUNTY
EDUCATION ASSOCIATION, and their
officers individually and in their official
capacity,

Defendants.

Case No. 3:17-cv-06482-PGS-TJB

Filed Electronically

Civil Action

**DECLARATION OF COUNSEL IN SUPPORT
OF MOTION TO EXTEND TIME WITHIN
WHICH TO ANSWER, MOVE OR OTHERWISE
PLEAD**

FLAVIO L. KOMUVES, of full age, certifies as follows:

1. I am an attorney at law, admitted to practice in all federal and state courts of the State of New Jersey. I am associated with Zazzali, Fagella, Nowak, Kleinbaum & Friedman, counsel to all defendants in this matter. As such, I am familiar with the relevant facts.

2. By this application pursuant to Loc. Civ. R. 6(a), Defendants seek an additional 14 days, to and including November 27, 2017, within which to answer, move, or otherwise plead in response to Plaintiff's complaint.

3. All Defendants previously waived service of the summons and complaint, making their initial answer due October 30, 2017. The undersigned counsel thereafter obtained a Clerk's Order pursuant to Loc. Civ. R. 6(b), extending their time to answer to November 13, 2017.

4. The additional time sought by Defendants is due chiefly to counsel workload, including being assigned to two emergent litigations and assisting a client with labor negotiations that have continued much longer than expected. In addition, due to client travel and meetings, I have not been to fully consult with the appropriate personnel to determine whether Defendants will move or answer, and what the contents of that pleading or motion will be.

5. I respectfully submit that this application comports in all respects with Loc. Civ. R. 6(a) and that good cause exists for granting it.

6. I reached out to Plaintiff by electronic mail this morning to ascertain if he consents to this application. Plaintiff responded that he does **not** consent.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Newark, New Jersey, this 10th day of November, 2017.

/s/ Flavio L. Komuves